

TIMELINE OF DISCOVERY ISSUES RELATED TO PRODUCTION OF QUIPS

Date	Description
Nov. 4, 2020	Plaintiffs propose production protocol for Quips. ECF No. 563-1 at pg. 3.
Aug. 13, 2021	Plaintiffs seek to discuss process for collection and review of Quips during discovery mediation. Weaver Decl., Ex. 126.
Jan. 19, 2022	Plaintiffs identify collection and production of Quips as an issue where the parties are at impasse on discovery mediation issue tracker. Weaver Decl., Ex. 130 (issue P07).
Apr. 8, 2022	Facebook agrees to provide Plaintiffs a letter describing its process for collecting and reviewing Quips and other types of internal, non-custodial documents by May 6, 2022. Laufenberg/Melamed Decl., ¶ 4.
May 8, 2022	Facebook discloses for the first time that some custodians' Quips were only collected based on interviews, whereas all Quips were collected for others. Facebook does not say which custodians are in which groups. Weaver Decl., Ex. 131.
July 22, 2022	Facebook provides description of Quips collection it promised, on April 8, to provide by May 6. Weaver Decl., Ex. 128. The description is insufficient.
Aug. 26, 2022	Special Master issues Second Amended Order on Plaintiffs' Motion to Compel Additional Production of Quips, Tasks, and Groups, finding that "additional information is necessary to determine whether Facebook's production of Quips and Tasks is deficient." ECF No. 1030-3, ¶ 11.